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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
DIVISION

**FILED**

NOV 17 2015

U.S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

BARTON PRINCE, #1237764

(Enter above the full name of the  
Plaintiff(s) in this action. Include prison  
registration number(s.))

v. (first name yet  
DOCTOR BRADSHAW unknown))

JANE DOE, (AMEY) (name yet  
unknown))

ROBERT JERRET

TAMMY ANDERSON

All sued in their individual  
and official capacities.

(Enter above the full name of ALL Defendant(s) in this action. Fed. R. Civ. P. 10(a) requires that the caption of the complaint include the names of all the parties. Merely listing one party and "et al." is insufficient. Please attach additional sheets if necessary.)

**4:15CV1700 HEA**

(To be assigned by Clerk)

**JURY TRIAL DEMANDED**

**PRISONER CIVIL RIGHTS COMPLAINT UNDER 42 U.S.C. § 1983**

I. PLACE OF PRESENT CONFINEMENT: NORTHEAST CORRECTIONAL CENTER,  
13698 AIRPORT ROAD, BOWLING GREEN, MISSOURI 63334.

II. PREVIOUS CIVIL ACTIONS:

A. Have you brought any other civil actions in state or federal court dealing with the same facts involved in this action or otherwise relating to your confinement?

YES [ ]

NO [x]

B. If your answer to "A" is YES, describe the action(s) in the space below. If there is more than one action, you must describe the additional action(s) on a separate piece of paper, using the same format as below.

1. Parties to previous civil action:

Plaintiff(s): N/A

Defendant(s): N/A

2. Court where filed: N/A

3. Docket or case number: N/A

4. Name of Judge: N/A

5. Basic claim made: N/A

6. Present disposition (Is the case still pending? Is it closed? If closed, was it appealed?):

N/A

III. GRIEVANCE PROCEDURES:

A. Is there a prisoner grievance procedure at the institution in which you are incarcerated?

YES  NO

B. Have you presented this grievance system the facts which are at issue in this complaint?

YES  NO

C. If your answer to "B" is YES, what steps did you take: INFORMAL RESOLUTION REQUEST, FORMAL GRIEVANCE AND GRIEVANCE APPEAL

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D. If your answer to "B" is NO, explain why you have not used the grievance system:

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IV. PARTIES TO THIS ACTION:

A. Plaintiff(s)

1. Name of Plaintiff: BARTON PRINCE  
NORTHEAST CORRECTIONAL CENTER
2. Plaintiff's address: 13698 AIRPORT ROAD, BOWLING GREEN, MO 63334
3. Registration number: 1237764
4. Additional Plaintiff(s) and address(es): None.

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B. Defendant(s)

1. Name of Defendant: DOCTOR BRADSHAW  
E.R.D.C.C., 2727 Highway K, BONNE
2. Defendant's address: TERRE, MISSOURI 63628.
3. Defendant's employer and job title: CORIZON AND MISSOURI  
DEPARTMENT OF CORRECTIONS AND IS A DENTIST.
4. Additional Defendant(s) and address(es): SEE NEXT ATTACHED PAGE

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ADDITIONAL DEFENDANT'S:

ROBERT JERRET  
DENTIST  
NORTHEAST CORRECTIONAL CENTER  
13698 AIRPORT ROAD  
BOWLING GREEN, MO 63334

Doctor Jerret is employed as a dentist with CORIZON and the Missouri Department of Corrections.

TAMMY ANDERSON  
NORTHEAST CORRECTIONAL CENTER  
13698 AIRPORT ROAD  
BOWLING GREEN, MO 63334

Tammy Anderson is employed as the Medical Director of NECC and is employed with CORIZON and the Missouri Department of Corrections.

JANE DOE  
EASTERN RECEPTION, DIAGNOSTIC & CORRECTIONAL CENTER (E.R.D.C.C.)  
2727 HIGHWAY K.  
BONNE TERRE, MO 63628

Jane Doe is a dental assistant at E.R.D.C.C. employed by CORIZON and the Missouri Department of Corrections whose name is presently unknown to plaintiff.

V. COUNSEL

A. Do you have an attorney to represent you in this action?

YES [ ] NO [XX]

B. If your answer to "A" is NO, have you made an effort to contact an attorney to represent you in this matter?

YES [X] NO [ ]

C. If your answer to "B" is YES, state the name(s) and address(es) of the attorneys you contacted and the results of those efforts:

John D. James, James Law Group, 14 Richmond Center Court  
St. Peters, Missouri 63376. (636)-397-2411 After a review  
of my case he cannot offer any help.

D. If your answer to "B" is NO, explain why you have not made such efforts:

N/A

E. Have you previously been represented by counsel in a civil action in this Court?

YES [ ] NO [X]

F. If your answer to "E" is YES, state the attorney's name and address:

N/A

VI. Statement of claim (State as briefly as possible the facts of your case. Describe how each defendant is involved. You must state exactly what each defendant personally did, or failed to do, which resulted in harm to you. Include also the names of other persons involved, dates, and places. Be as specific as possible. State your claims in numbered paragraphs. You may use additional paper if necessary):

1. While a prisoner at the Eastern Reception &

Diagnostic Correctional Center on or about October or

November 2013, Plaintiff was having defendant Doctor

Bradshaw pull one of plaintiff's teeth per plaintiff's

request.

2. After the procedure plaintiff an elderly man in

his 70s discovered that Doctor Bradshaw had pulled all

of plaintiff's bottom teeth. Doctor Bradshaw was assisted

in the dental procedure by his assistant Jane Doe. When

Plaintiff told defendant Bradshaw and Doe he was only there

to have one tooth pulled assistant Doe checked Plaintiff's

I.D. and stated; "Doctor there are two Mr. Prince's here

today and we pulled all of the bottom teeth of the wrong

prisoner."

3. As stated, plaintiff is an elderly man and is in

his 70s and this caused plaintiff new and other related

health problems including but not limited to digestive

problems because he is unable to chew his food. It causes

plaintiff painful stomach aches, diarrhea and bloating.

SEE NEXT ATTACHED PAGES 5A-5B

Plaintiff also has sever pain in his mouth and gums from trying to chew food without teeth. Plaintiff has had bleeding in his mouth (gum area) on many occasions.

4. Plaintiff Barton Prince was then transferred to the Northeast Correctional Center in Bowling Green, Missouri and in 2014 he put in a medical service request to the dentist and explained to (dentist) Doctor Robert Jerret what had took place at ERDCC in Bonne Terre where Doctor Bradshaw had pulled all of plaintiff's bottom teeth when he was only suppose to pull one. Defendant Tammy Anderson and Defendant Doctor Robert Jerret determined that plaintiff would need a set of bottom dentures since the ones made at ERDCC in Bonne Terre were faulty.

5. Defendant Jerret and Anderson insisted plaintiff would have to give them his personal dentures so they could send the dentures out to be fitted to make new bottom dentures for the wrongfully pulled bottom teeth. Plaintiff told both defendant's Jerret and Anderson not to loose or let anything happen to his personal dentures because they personally costed plaintiff \$3,000.00. Defendant's Jerret and Anderson assured plaintiff nothing would happen to his \$3,000.00 personal teeth.

6. A month later it was discovered that the plaintiff's personal \$3,000.00 teeth had been stolen by defendant Jerret and Anderson for personal gain and profit.

7. Not having the dentures caused and continue to cause plaintiff problems digesting his food being unable to chew the food. It continues to cause plaintiff painful stomach aches, diarrhea and bloating. Plaintiff continues to have sever pain in his mouth and gums from

trying to chew his food without teeth or working dentures. Plaintiff continues to have bleeding in his mouth (gum area) on occasion.

CLAIMS FOR RELIEF:

8. The actions of defendant Doctor Bradshaw and defendant Jane Doe in pulling all of plaintiff's bottom teeth and its affect constituted cruel and unusual punishment and constitutes deliberate indifference to the plaintiff's serious medical needs both in violation of the Eighth Amendment to the United States Constitution.

9. The actions of defendant's Doctor Robert Jerret and defendant Tammy Anderson in stealing defendant's personal \$3,000.00 dentures and its affect on defendant's health constitutes cruel and unusual punishment and constitutes deliberate indifference to the plaintiff's serious medical needs both in violation of the Eighth Amendment to the United States constitution.

VII. RELIEF

State briefly and exactly what you want the Court to do for you. Do not make legal arguments. (Note: If you are a state prisoner and you seek from this Court relief that affects the length or duration of your imprisonment, your case **must** be filed on a § 2254 form.)

Order defendant Doctor Robert Jerret and defendant Tammy Anderson to return the stolen \$3,000.00 dentures or replace them with the same identical denture that they stole.

VIII. MONEY DAMAGES:

A) Do you claim either actual or punitive monetary damages for the acts alleged in this complaint?

YES  NO

B) If your answer to "A" is YES, state below the amount claimed and the reason or reasons you believe you are entitled to recover such money damages:

\$250.000.00 each in actual damages against defendant's Bradshaw and Doe for the loss of plaintiff's teeth and compensatory of \$150.000.00 each for the physical and emotional injury resulting from their failure to provide adequate medical care to plaintiff. And punitive damages each in the amount of \$30.000.00. Please see next attached page. Page 6-A

IX. Do you claim that the wrongs alleged in the complaint are continuing to occur at the present time?

YES  NO

Barton Prince 1237764  
Signature of attorney or pro se Plaintiff(s)  
Barton Prince 1237764  
Plaintiff, Pro-se

11-13-15  
Date

DAMAGES CONTINUES:

\$3,000.00 each in actual damages against defendant's Robert Jerret and defendant Tammy Anderson for the \$3,000.00 dentures they stole and compensatory of \$30,000.00 each for the physical and emotional injury resulting from their failure to provide adequate medical care to plaintiff. And punitive damages each in the amount of \$10,000.00.